

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JOINT MOTION TO TRANSFER

Plaintiff Vincent Reed (“Plaintiff”) and Defendant Allconnect, Inc. (“Defendant”), by and through the undersigned counsel, hereby move the Court to transfer this action (“the *Reed* case”) to United States District Judge William S. Duffey, Jr. for the foregoing reasons:

1. Plaintiff was given notice to opt-into and join the case *Randle v. Allconnect*, 1:14-cv-00245-WSD, a collective action brought under the Fair Labor Standards Act (“FLSA”) and currently pending before Judge Duffey. Plaintiff declined to join the *Randle* collective action.

2. On April 10, 2014, Plaintiff filed this individual FLSA action against Defendant. (Dkt. No. 1.) The claims raised by Plaintiff in this individual FLSA

action are based on substantially the same factual allegations and legal theories as are being asserted in the *Randle* collective action.

3. On May 7, 2014, two additional putative opt-in plaintiffs in the *Randle* collective action filed individual FLSA actions against Defendant. *See Adams v. Allconnect, Inc.*, Case No. 1:14-cv-01375-RWS; *Green v. Allconnect, Inc.*, Case No. 1:14-cv-01384-TWT. The *Adams* and *Green* actions are based on substantially the same factual allegations and legal theories as are being asserted in this action and in the *Randle* collective action. Moreover, counsel for Plaintiff in this action is also representing the Plaintiffs in the *Adams* and *Green* actions.

4. On July 24, 2014, Defendant filed a Motion to Consolidate this action, as well as the *Adams* and *Green* actions, with the *Randle* collective action. (Dkt. No. 21.)

5. The parties conferred and, in lieu of Defendant's Motion to Consolidate, have agreed to transfer of the cases to Judge Duffey, thus allowing the parties to litigate the matters in front of the same judge, preserving judicial resources and avoiding potentially inconsistent rulings among substantially similar cases;

6. The parties therefore respectfully request that this case be transferred to United States District Judge William S. Duffey, Jr. The parties represent and

warrant that this Joint Motion is brought in good faith and will not prejudice either party.

Respectfully submitted this 8th day of August, 2014.

/s/ Louis R. Cohan

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

VINCENT REED,)
Plaintiff,)
vs.,) CASE NO. 1:14-CV-01061-SCJ
ALLCONNECT, INC.,)
Defendant.)

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CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorney of record:

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/s/*Matthew R. Simpson*
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